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Attorneys for Plaintiffs CANNON HUGH DANIELS,  
ARIELE ROSTAMO aka ARIELE NELSON, SUSAN  
ADELL DANIELS, and JOSEPH ALBERT DANIELS, IV

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

CANNON HUGH DANIELS, deceased;  
decedent's wife, ARIELE ROSTAMO aka  
ARIELE NELSON; decedent's mother,  
SUSAN ADELL DANIELS; and decedent's  
father, JOSEPH ALBERT DANIELS, IV,  
individually,

Plaintiff,

vs.

CALIFORNIA FORENSIC MEDICAL  
GROUP, INC., WELLPATH  
MANAGEMENT, INC., BUTTE COUNTY,  
S. Parker, D. Brownfield, Sergeant Turner,  
Sergeant Behlke, Deputy Darnell, Deputy  
Smith, Deputy Yee, Deputy Bazan, Deputy  
Thornton, Sergeant Mell, Deputy Lazurenko,  
Deputy LaRue, Deputy Ogden, Deputy  
Mayfield, Deputy Davis, Deputy Tauscher and  
Lt. Jarrod Agurkis, SACRAMENTO  
COUNTY, Officer McKersie, Sergeant Bunn,  
Sergeant Jenkins, Officer Rickett, Lieutenant  
Hodgkins, Officer Gailey, Officer Tallman,  
Officer Pomosson, and Officer Folena  
Defendants. /

**Case No.: 2:21-cv-0277 JAM-JDP**

**JOINT STIPULATION AND ORDER**

Complaint Filed: 02/11/2021

The parties hereby submit this JOINT STIPULATION AND [PROPOSED ORDER] to extend the fact discovery deadline to November 1, 2022. All parties have been diligently engaged in fact discovery and realize that they will not be able to finish fact discovery, including written discovery and numerous depositions, until after the current deadline of September 16, 2022. Now, therefore, all the parties submit the following stipulation and request for order to extend the fact discovery deadline, as follows:

IT IS HEREBY STIPULATED by and between the parties through their counsel of record:

1. The current fact discovery deadline of September 16, 2022, shall be extended to November 1, 2022;
2. All other dates previously set by the Court shall remain the same.

**IT IS SO STIPULATED.**

Date: July 15, 2022

PORTER | SCOTT  
A PROFESSIONAL CORPORATION

By /s/ William Camy  
William E. Camy  
Alison J. Southard  
Attorneys for Butte County Defendants

Date: July 15, 2022

LAW OFFICES OF JEROME M. VARANINI

By /s/ Jerome Varanini  
Jerome M. Varanini  
Attorney for Defendants CALIFORNIA  
FORENSIC MEDICAL GROUP, INC., and  
WELLPATH MANAGEMENT, INC

Date: July 15, 2022

ANDREW E. BAKOS & ASSOCIATES, P.C.

By /s/ Andrew Bakos  
Andrew Bakos  
Attorney for Plaintiffs

1 Date: July 15, 2022

D.B. HILL, A PROFESSIONAL LAW CORPORATION

2  
3 By /s/ Dennis B. Hill

4 Dennis B. Hill

Attorney for Plaintiffs

5 **ORDER**

6 Pursuant to the stipulation of the parties, and good cause appearing therefore, **IT IS HEREBY**  
7 **ORDERED** as follows:

8 The fact discovery deadline is hereby extended to November 1, 2022.

9 **IT IS SO ORDERED.**

10  
11 Date: July 15, 2022

/s/ John A. Mendez

12 THE HONORABLE JOHN A. MENDEZ

13 SENIOR UNITED STATES DISTRICT COURT JUDGE